



MAP and APA with India - An opportunity for controversy management?

Tuesday, 17 April 2018, 11:00 AM - 12:00 PM CEST / 10:00 AM – 11:00 AM BST

Dear all,

As you may know TP controversy in India has been one of the significant challenges for MNEs with operations in India. However with the introduction of the Advance Pricing Agreement (APA) program in India in 2012, MNEs have been able to use APAs resolve TP controversy on various complex issues. In past India had taken a view that Mutual Agreement Procedures (MAP) on transfer pricing issues and bilateral APAs would not be accepted where Article 9(2) of the OECD Model Convention or equivalent article was not present in the respective double tax treaty with the other country

Towards end of last year, the Indian Government issued a press release announcing relaxation of presence of Article 9(2) or equivalent. With this change, **Taxpayers facing double taxation on transfer pricing matters between India and, inter alia, Germany, France and Italy have now, for the first time, the opportunity to obtain relief from double taxation via these controversy management tools.**

In our webcast “MAP and APAs with India – A Controversy Management Opportunity?” we would like to inform you about the formal requirements, deadlines and technicalities of these procedures from an Indian tax perspective as well as other key aspects. **In particular, given that Indian government has signed more than 200 APAs (including 20 bilateral), we will share experiences obtained in relation to such resolutions between India and other countries in order to provide a first outlook on potential outcomes.** The session will also include a brief update on Indian CbCR requirements and recent key TP controversy issues.

Please remember to register for the event in advance:

Registration



We look very forward to your participation!

Dr. Juliane Sassmann | Partner | Certified Tax Accountant (German bar) | International Tax Services – Transfer pricing

Vijay Iyer | Partner | Head of TP India New Delhi | International Tax

Amit B Jain | Partner | India Tax Desk in London | International Tax

Joining details	Note regarding audio	Information for connecting via tablet/smart device
Once registered, you will be provided with a registration confirmation email to access the webcast log-in page. Click on "Already Registered?", enter your email address into the "Login" field and click on the button "launch presentation". You will be able to access the webcast 10 minutes before the start.	The webcast audio will only be transmitted via the internet, so please ensure your computer or tablet/smartphone speakers are switched on and consider using a headset.	The experience will be similar to what you would see using a laptop. You can register, attend and interact in the webcast using your smartphone or tablet.

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Any more questions? Please consult our [webcast FAQs](#).

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